

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,  
MARISSA BLAIR, APRIL MUNIZ,  
MARCUS MARTIN, NATALIE ROMERO,  
CHELSEA ALVARADO, THOMAS BAKER  
and JOHN DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,  
CHRISTOPHER CANTWELL, JAMES  
ALEX FIELDS, JR., VANGUARD  
AMERICA, ANDREW ANGLIN,  
MOONBASE HOLDINGS, LLC, ROBERT  
“AZZMADOR” RAY, NATHAN DAMIGO,  
ELLIOT KLINE a/k/a/ ELI MOSLEY,  
IDENTITY EVROPA, MATTHEW  
HEIMBACH, MATTHEW PARROTT a/k/a  
DAVID MATTHEW PARROTT,  
TRADITIONALIST WORKER PARTY,  
MICHAEL HILL, MICHAEL TUBBS,  
LEAGUE OF THE SOUTH, JEFF SCHOEP,  
NATIONAL SOCIALIST MOVEMENT,  
NATIONALIST FRONT, AUGUSTUS SOL  
INVICTUS, FRATERNAL ORDER OF THE  
ALT-KNIGHTS, MICHAEL “ENOCH”  
PEINOVICH, LOYAL WHITE KNIGHTS OF  
THE KU KLUX KLAN, and EAST COAST  
KNIGHTS OF THE KU KLUX KLAN a/k/a  
EAST COAST KNIGHTS OF THE TRUE  
INVISIBLE EMPIRE,

Defendants.

**Civil Action No. 3:17-cv-00072-NKM**

**PLAINTIFFS’ MOTION TO SEAL CERTAIN EXHIBITS TO PLAINTIFFS’  
SUPPLEMENTAL MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFFS’  
MOTION FOR SANCTIONS AGAINST DEFENDANT MATTHEW HEIMBACH**

On August 11, 2021, Plaintiffs filed a Supplemental Memorandum of Law in Support of Plaintiffs' Motion for Sanctions Against Defendant Matthew Heimbach (the "Supplemental Memorandum"). ECF 1005. Plaintiffs hereby respectfully request that the Court enter the enclosed proposed order sealing an unredacted version of Exhibit 1, Exhibit 6, and Exhibit 17 to Plaintiffs' Supplemental Memorandum, which were submitted conditionally under seal today in this matter.

Exhibit 1 (unredacted) contains Highly Confidential Information as defined by the Order for the Production of Documents and Exchange of Confidential Information on January 3, 2018, ECF 167 (the "Protective Order").

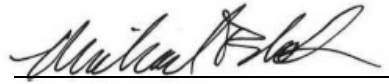
Exhibit 6 was designated Highly Confidential by Matthew Heimbach pursuant to Protective Order.

Exhibit 17 was designated Highly Confidential by T-Mobile pursuant to the Protective Order.

Although Plaintiffs reserve their right to challenge all confidentiality designations, for the reasons set forth herein, Plaintiffs request that Exhibits 1, 6 and 17 to Plaintiffs' Motion to Compel be sealed in accordance with Local Rule 9.

Date: August 12, 2021

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Roberta Kaplan', is written over a horizontal line.

Roberta A. Kaplan (*pro hac vice*)  
Julie E. Fink (*pro hac vice*)  
Gabrielle E. Tenzer (*pro hac vice*)  
Michael L. Bloch (*pro hac vice*)  
Yotam Barkai (*pro hac vice*)  
Emily C. Cole (*pro hac vice*)  
Alexandra K. Conlon (*pro hac vice*)  
Jonathan R. Kay (*pro hac vice*)  
Benjamin D. White (*pro hac vice*)  
KAPLAN HECKER & FINK LLP  
350 Fifth Avenue, Suite 7110  
New York, NY 10118  
Telephone: (212) 763-0883  
rkaplan@kaplanhecker.com  
jfink@kaplanhecker.com  
gtenzer@kaplanhecker.com  
mbloch@kaplanhecker.com  
ybarkai@kaplanhecker.com  
ecole@kaplanhecker.com  
aconlon@kaplanhecker.com  
jkay@kaplanhecker.com  
bwhite@kaplanhecker.com

*Counsel for Plaintiffs*

Of Counsel:

Robert T. Cahill (VSB 38562)  
COOLEY LLP  
11951 Freedom Drive, 14th Floor  
Reston, VA 20190-5656  
Telephone: (703) 456-8000  
Fax: (703) 456-8100  
rcahill@cooley.com

Karen L. Dunn (*pro hac vice*)  
William A. Isaacson (*pro hac vice*)  
Jessica Phillips (*pro hac vice*)  
PAUL WEISS RIFKIND WHARTON &  
GARRISON LLP  
2001 K Street, NW  
Washington, DC 20006  
Telephone: (202) 223-7300  
Fax: (202) 223-7420  
kdunn@paulweiss.com  
wisaacson@paulweiss.com  
jphillips@paulweiss.com

Alan Levine (*pro hac vice*)  
Philip Bowman (*pro hac vice*)  
COOLEY LLP  
1114 Avenue of the Americas, 46th Floor New  
York, NY 10036  
Telephone: (212) 479-6260  
Fax: (212) 479-6275  
alevine@cooley.com  
pbowman@cooley.com

David E. Mills (*pro hac vice*)  
Joshua M. Siegel (VSB 73416)  
COOLEY LLP  
1299 Pennsylvania Avenue, NW  
Suite 700  
Washington, DC 20004  
Telephone: (202) 842-7800  
Fax: (202) 842-7899  
dmills@cooley.com  
jsiegel@cooley.com

J. Benjamin Rottenborn (VSB 84796)  
WOODS ROGERS PLC  
10 South Jefferson St., Suite 1400  
Roanoke, VA 24011  
Telephone: (540) 983-7600  
Fax: (540) 983-7711  
brottenborn@woodsrogers.com

*Counsel for Plaintiffs*

### CERTIFICATE OF SERVICE

I hereby certify that on August 12, 2021, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

Elmer Woodard  
5661 US Hwy 29  
Blairs, VA 24527  
isuecrooks@comcast.net

James E. Kolenich  
Kolenich Law Office  
9435 Waterstone Blvd. #140  
Cincinnati, OH 45249  
jek318@gmail.com

*Counsel for Defendants Jason Kessler, Nathan Damigo, Identity Europa, Inc. (Identity Evropa), Matthew Parrott, and Traditionalist Worker Party*

Bryan Jones  
106 W. South St., Suite 211  
Charlottesville, VA 22902  
bryan@bjoneslegal.com

*Counsel for Defendants Michael Hill, Michael Tubbs, and League of the South*

David L. Campbell  
Justin Saunders Gravatt  
Duane, Hauck, Davis & Gravatt, P.C.  
100 West Franklin Street, Suite 100  
Richmond, VA 23220  
dcampbell@dhdglaw.com  
jgravatt@dhdglaw.com

*Counsel for Defendant James A. Fields, Jr.*

William Edward ReBrook, IV  
The ReBrook Law Office  
6013 Clerkenwell Court  
Burke, VA 22015  
edward@rebrooklaw.com

*Counsel for Defendants Jeff Schoep, National Socialist Movement, and Nationalist Front*

I hereby certify that on August 12, 2021, I also served the following non-ECF participants via mail and electronic mail:

Richard Spencer  
richardbspencer@icloud.com  
richardbspencer@gmail.com

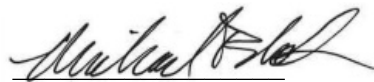
Christopher Cantwell  
Christopher Cantwell 00991-509  
USP Marion, 4500 Prison Rd.  
P.O. Box 2000  
Marion, IL 62959

Vanguard America  
c/o Dillon Hopper  
dillon\_hopper@protonmail.com

Robert "Azzmador" Ray  
azzmador@gmail.com

Elliott Kline a/k/a Eli Mosley  
eli.f.mosley@gmail.com  
deplorabletruth@gmail.com  
eli.r.kline@gmail.com

Matthew Heimbach  
matthew.w.heimbach@gmail.com

A handwritten signature in cursive script, appearing to read "Michael Bloch".

Michael L Bloch (*pro hac vice*)  
KAPLAN HECKER & FINK LLP

Counsel for Plaintiffs